



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

November 3, 2004

Lonnie Monaco (monacolj@efane.northdiv.navy.mil)
Engineering Field Activity Northeast, Naval Facilities Engineering Command
Code 1821/LM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: *Monitoring Event 24 Report for Site 9, Ash Landfill/Dump Area, dated September 2004 for the Naval Air Station Brunswick, Maine*

Dear Mr. Monaco:

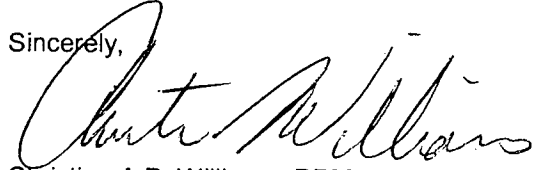
Pursuant to § 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency has reviewed the subject documents and comments are below:

1. **p. 1-3, sec. 1.3, and Table 4:** It is reassuring to observe that the field parameters collected at MW-NASB-069 by both following a low-flow purge and in the static water in the wellbore after withdrawing the diffusion samplers are quite comparable (DO 3.45 and 3.27 mg/L, respectively; ORP 177 and 166 mV, respectively). This has not always been the case in Eastern Plume sampling.
2. **p. 1-4, sec. 1.4, fifth bullet:** Please change "The Eh concentration was lower ..." to "The Eh was lower ..."
3. **p. 2-2, sec. 2.2.2.1 and Fig. 4:** As noted in previous reviews, the polynomial fits shown in Figure 4 are not very meaningful without showing the discrete data upon which the fits are based. First, there is no particular reason to expect a third-order polynomial form for the fitting function (i.e., this is an arbitrary empiricism). Second, there is no indication, either qualitative (e.g., a visual comparison of the data to the fit) or quantitative (e.g., a statistical measure of "goodness of fit") by which the reader can judge the adequacy of the fits in capturing the overall trends. Please consider showing the discrete data points along with the polynomial fits, using the same color for the data and fit for each well.
4. **p. 2-3, sec. 2.2.2.1, MW-NASB-022:** Is there any speculation as to potential sources of the increasing trichlorofluoromethane (Freon-11) observed at this well (19 to 103 micrograms per liter from ME 23 to ME24)? Are there known recent applications in the vicinity of this well (e.g., old refrigeration systems, insect fumigation, etc.)?
5. **App. C, MW-NASB-079:** It is noted that the low-flow sample from this well showed an anomalously high detection of manganese in ME23 (~650 micrograms per liter), but that Mn returned in ME24 to a value typical of all previous rounds (~100 micrograms per liter). The previous result, then, appears to be an anomaly. It is noted that both ORP

(-115 mV in ME 23; -112 mV in ME 24) and turbidity (4 NTU in ME 23; 6 NTU in ME 24) are nearly identical for the two rounds, suggesting that some of the more common explanations for a "spike" in Mn (e.g., an excursion in redox conditions or a turbid sample) do not apply.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,



Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc. Claudia Sait/ME DEP (claudia.b.sait@state.me.us)
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